Dockets-222

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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21 JUN 1993

IN REPLY REFER TO:
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Honorable J. James Exon
United States Senate
528 Senate Hart Building
Washington, D.C. 20510-2702

Dear Senator Exon:

This is in response to your letter of June 4, 1993, in which you inquired on behalf of your constituent, Mr. Edmund J. Kirker, regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). Mr. Kirker is specifically concerned about the potential impact of our final rules on radio remote controlled airplane hobbyists.

Model airplane users have shared spectrum on a secondary basis with industrial users for over 25 years. The low power industrial user and the radio control model airplane hobbyists effectively share spectrum through geographic separation. We are enclosing the Report and Order in GEN Docket 82-181, 47 FR 51875 (1982), which provided the current 50 channels for radio controlled model airplanes. These rules, adopted at the behest of the model airplane community, provide no protection from interference from licensed sources. We further note that the radio environment is inherently hazardous and that even primary allocations suffer from problems. For example, model aircraft users receive interference from other model aircraft users and from certain TV channels. Thus, model aircraft must be, and in fact are, capable of co-existing with some interference.

The Commission is seeking to work with all parties on this matter. To this

J. JAMES EXON
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PRB
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2430

COMMITTEES:
ARMED SERVICES
COMMERCE, SCIENCE, AND TRANSPORTATION
BUDGET

June 4, 1993

Federal Communications Commission
Congressional Liaison
1919 M Street, N.W.
Washington, D.C. 20554

Dear Sir:

I am enclosing a letter from:

Edmund J. Kirker
6217 South 142 Street
Omaha, NE 68137-4801

whose problem appears to fall within your jurisdiction.

I would appreciate any information which will enable me to respond to my constituent's inquiry. Please return the enclosed correspondence with your report to:

Senator J. James Exon
ATTN: Doris Petersen
United States Senate
Washington, DC 20510

Cordially,

Jim Exon
United States Senator

Enclosure

93 JUN -2 AM 10: 14

Edmund J. Kirker
6217 S. 142nd Street
Omaha, NE 68137-4801
May 26, 1993

The Honorable J. James Exon
United States Senate
Washington, D. C. 20510

Dear Sir:

I cannot accept the FCC's response to the concern's of Radio Control (RC) modelers that the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992) would have no adverse impact on RC operations.

The suggestion that power output levels are comparable is inaccurate. The levels referred to are the maximum allowable. In actual practice, these maximum levels cannot be maintained. Our equipment relies on battery power which, as the batteries drain or age, reduce the power output levels of the transmitter. Because of this the transmitter normally puts out approximately 1/2 watt. Also, the antenna's position is not fixed, but varies considerably during use, again reducing output. The presence of a higher output transmitter located in close proximity to RC operations on a frequency so close creates a very poor receiver environment. The FCC does not know the impact that will result in actual practice by placing a 1/2 watt user and a 1 watt user nearby. The Academy of Model Aeronautics has undertaken this study with the permission of the FCC.

The proposed spacing of 2.5 khz is too close to RC operations. RC receivers are very sensitive and incorporate the highest technical standards. However, even if the FCC incorporates the receiver tolerance used by RC receivers of 1.5 khz, the frequency spacing would have to be at least 3.0 khz (1.5+1.5=3.0). 2.5 khz spacing will not work! Even 3.0 is too close as information band widths may still overlap. 5 khz separation might be a workable solution between RC users and Land Mobile Radio users. Otherwise, the FCC will need to develop and manage a system of advising each group of the others location and intended use, a costly proposition considering the number of users.

The FCC also misrepresents the Land Mobile Radio user as crane operators and that they will not interfere with RC users because RC users seek clear areas and fields. Land mobile use is defined as "General Category Pool" which allows for many applications besides crane operations. However, regarding crane use, RC modelers are increasingly flying in urban areas where a small park or area might allow. To assume that cranes or RC models are safe because of location separation is foolhardy, especially when the FCC's proposal adds more mobile users next to or on top of RC frequencies. Using the FCC's argument that power output is

comparable and that 2.5 khz separation is satisfactory actually places an RC user in a position where he can't help but cause interference if a crane is nearby. The potential for loss of control of a model is high, but more important, loss of control of a crane may also be possible. It would not be in the interest of anyone to have a construction load of beams, girders, lumber, or cement tumble onto nearby pedestrians or workers. Such an incident could occur without either operator knowing what actually went wrong, wasting resources to fruitlessly attempt to prevent another mishap.

The proposed changes for private land mobile radio use are not compatible with current technical and operational requirements for radio control operations as stated in the FCC's discussion paper. I urge the FCC to consider and implement the Academy of Model Aeronautics study results and recommendations to achieve a workable and safe environment for users to operate in.

Thank you,